



September 24, 2009

The Honorable Peter DeVries, Council Chair
Washington State Building Code Council
128 10th Avenue SW
P.O. Box 42525
Olympia, WA 98504-2525

Dear Chairman DeVries:

I am writing to support the Council's adoption of the proposed changes to the Washington State Energy Code that were developed by the Energy Code TAG.

The Northwest Energy Efficiency Alliance (NEEA) has been by far the largest supporter of energy code education and training in Washington for the past ten years. NEEA's funding has allowed the WSU Energy Extension Program and the Northwest Energy Efficiency Council to consistently offer high quality training on both the residential and non-residential codes. In addition, NEEA funding has been used to provide technical support to building professionals and jurisdictions and to develop code compliance materials such as the revised WSEC Builders' Field Guide. As someone who attends many national energy code meetings I can confidently state that the quantity and quality of training provided in this state is the envy of the rest of the country. This is true even though the WSEC is self-promulgated and does not have the benefits that supposedly derive from adopting the national model code.

NEEA has budgeted over \$250,000 to support the implementation of the new code in 2010. NEEA's contractors will be providing training and materials to all groups affected by the code, ensuring a smooth transition from the existing code and high initial implementation rates.

As a final point, concerns have been raised about the legality of the options menu in Chapter 9; specifically, that it is in conflict with federal pre-emption requirements in the National Appliance Energy Conservation Act. There is no basis to this argument. The options in Chapter 9 build directly upon a menu approach that was pioneered in the Oregon energy code in 2008. It was reviewed by the Air-Conditioning, Heating, and Refrigeration Institute, the national trade association which has vigorously enforced the pre-emption requirements, and they had absolutely no objections to it.

NEEA stands ready to help the State of Washington achieve its energy efficiency and environmental goals. I respectfully request that the SBCC approve the proposed changes to the WSEC.

Sincerely,

A handwritten signature in blue ink that reads "David Cohan".

David Cohan
Manager, Codes and Standards